

United States District Court for
The Western District of Pennsylvania
Case No.

Dana W. Wiley,
Plaintiff,

2:18-CV-01207-CRE

V.

World Wrestling Entertainment
CEO: Vince McMahon and John Due
D-Generation X / NWO Wrestling employees,
Defendants;

Plaintiff's complaint for (1) Federal Trademark Infringement, 15 u.s.c 1114; (2) Fair use copyright trademark agreement to advertise, promote and distribute, without unfair royalty payment pursue of unfair competition, 15 u.s.c 1125(a); (3) Deceptive And Unfair Trade Practices, F.S.A 501, (4) Breach of Contract.

I. Introduction.

This matter concerns the trademark of the defendants; CEO, Vince McMahon and John Due of the D-Generation X / New World Order wrestling employees for failure to release the official copyright contract hereto plaintiff, Dana Wiley along with royalty payment for above work titled: D-Generation X / New World Order Merchandise in support of Exhibit(A) page 1 of 6.

2. Introduction.

Dana Wiley brings this action to secure relief under federal and Pennsylvania state law. Dana Wiley seeks: (a) Temporary Preliminary and Permanent injunctions; pursuant to 15 u.s.c 1117(a) requiring the defendants to release the official fair use copyright contract (B) royalty payment damages and (C) defendant pay cost of this action and any legal fees.

II. Parties

1. Plaintiff, Dana Wiley is a public residence under the laws of the state of Pennsylvania at: 531 Case Street Apt-9 Rochester, Pa 15074 cell phone: 724/558/7679. He is in good standing with the federal and state Pennsylvania laws. He has exhausted all federal and state remedies and done everything necessary and proper to bring this lawsuit.

2. Defendants based on information and belief. World Wrestling Entertainment CEO; Vince McMahon John Due of the D-Generation X / New World Order wrestling employees has jurisdiction of this matter and is located at above address: 1241 East Main Street Stamford, CT 06902

III. Jurisdiction And Venue

This Court has original jurisdiction pursuant to the 5th amendment under 15 u.s.c 1121(a) (action arising under the Lanham Act) and 28 u.s.c 1331, 1338(a) (federal question) in that this case arises under the Trademark Laws of the United States, 15 u.s.c 1051-1127.

2. This Court has jurisdiction pursuant to the 5th amendment under 28 u.s.c 1338(b) in accordance with the principles of pendant jurisdiction in that said claims are joined with substantial and related claims under the Trademark of the

United States, 15 u.s.c 1051-1127.

Statement of Facts.

1. Plaintiff, Dana Wiley signed a fair use copyright contract with the above defendants; world wrestling entertainment: CEO; Vince McMahon John Due of the D-Generation X / New World Order wrestling employees on August 21, 1995 in front of the Lawrence County Courthouse of New Castle, Pa officially after Dana Wiley was sentenced in an unrelated criminal case No. 1144/1994 for the above trademark work titled (D-Generation X / New World Order merchandise).
2. These defendant's over 20 plus year's has ignored nor responded to numerous cease and desist notices, similar as exhibit (A) Page 1 of 6 that plaintiff, Dana Wiley submitted to the defendant's on July 12, 2018.
3. These defendant's has failed to release a copy of the fair use copyright contract hereto plaintiff, Dana Wiley for the above trademark work titled: D-Generation X and New World Order Merchandise along with a royalty payment.

Conclusion.

Heretofore on above day of ~~SEP~~ 10, 2018 Plaintiff, Dana Wiley hereby seeks (a) Temporary preliminary and permanent injunctions pursuant to 15 u.s.c 1117(a) (A) Court ordering the defendants to respond to the allegations of these facts in support of exhibit (A) page 1 of 6 within (30) days.

(B) court order the defendant's to release official copy of the fair use copyright contract hereto Plaintiff, Dana Wiley.

(C) court order the defendant's to pay royalty damages hereto plaintiff, Dana Wiley in the amount of \$75-million no less than \$10-million herefor above trademark work titled (D-Generation X / New World Order Merchandise).

(D) require the defendant's to pay cost of this action or any legal fees by the court's.

The said allegation are hereby true and correct in accordance of the United States laws of the U.S. Constitution of perjury the above defendant's has been hereby pro'se served by the clerk of courts of the United States Federal Court of Western Pennsylvania and plaintiff, Dana Wiley.

First class certified mail
on above Date: September 10, 2018

Dana Wiley, Plaintiff
531 Case Street Apt-9
Rochester, Pa 15074
cell phone No. 724-558-7679

Dana Wiley

World Wrestling Entertainment
CEO; Vince McMahon John Due of the
D-Generation X / New World Order
wrestling employees
1241 East main street
Stamford, CT 06902

CEASE AND DESIST NOTICE
REQUEST FOR ROYALTY PAYMENT
FOR INFRINGEMENT OF COPYRIGHT

Dear;World Wrestling Entertainment
CEOP:Vincent McMahon And All
D-GenrationX/NWO Wrestling Employees

Case No.7/12/2018

"STATEMENT OF Facts"

It has become to my attention I hereby confirm that (WWE.ET-AL) wrongfully
infringed my right's in accordance to section;107 of 1988
Campbell Vs. Acuff-Rose Music,Inc and
Automatic Radio Co Vs.Hazeltine Research,Inc.,339 U.S. 827(1950)
herefor the copyright work entitled(D-GenrationX/NWO merchandise.

STATEMENT OF ARGUMENT

(WWE.ET.AL) over the course of 20-year's they have officialy failed to provide
I, Dana W.Wiley a royalty payment for the above work entitled.
(D-GenrationX/NWO merchandise) you have all so ignored several letter's
Dated:3/9/2011., from I,Dana W.Wiley seeking royalty payment of sum
\$3-million a year for life time payment; along with a copy of the official
fair-use Law act of sect,107(1988)5th amendment; copyright contract
we agreed upon on the above date of August 21,1995.

STATEMENT OF COLLUSION

I,Dana W.Wiley; seek's the royalty settlement payment of \$75-million no less
then \$10-million herefrom (WWE.ET.AL)
for the above work entitled (D-GebrationX/NWO Merchandise)
WWE.,ET.AL) has officialy (30) Day's to resolve this matter with I,Dana W.Wiley
in accordance of Privacy law-Act of 1974,5 u.s.c 552a,
if (WWE.ET.AL) failes to resolve this matter within (30)Day's you hereby
waive all right's and officialy confirm the said foregoing is true and correct
pursue to the penalty of perjury section,(18 u.s.c 1621).

SINCERELY TURLY YOUR'S

DANA W.WILEY;
531 CASE STREET APARTMENT#9
ROCHESTER,PA 15074
CELL PHONE NUMBER#724/558/7679
EMAIL:williamdana806@yahoo.com
wileydana07@gmail.com
Date:7/12/2018

Dana W. Wiley

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MR. DANA, W. WILEY CT-9123

Date Birth 3/22/1977

Place Birth Detroit Mich

SSI No. 173-58-3176

home Address

1115. MILTON ST NewCastle PA, 16101 or

Sci. Greene 175 Progress Drive Waynesburg PA. 15370

Phone No. 724-947-0997 or 724-652-5935

The information is I DANA, W. WILEY CT-9123
AKA Ghetto, D

True and correct Identification under
U.S. CONST of PENALTY PerJury Law.

Grievance complaint
request under Section 703(H) Law and
release Documents

here and To The employer
CEO of World Wrestling Entertainment

Fax No. 203-359-5151

Phone No. 203-352-8600 or 212-398-1815

DATE, 3/9/2011

Page 2 of 1

Date month and year employed by WWE

7th 8 and 9 Day October 1994

21th Day August 1995

September 1996 and October 2, 1998

I am as to date still employed by WWE

Yes on 9 Day of March 2011

I been employed by WWE for

Seventeen Years

WWE require my Job to be superstar wresler
write and create music song sounds and
Design The Degeneration X and NWO ET-AL clothing
Line with investment of seventy \$75 million
Dollars into WWE stock market along with
TNA Impact

WWE require to Pay me over Three^{\$}(3) or more
million Dollars a Year

The employer of WWE employees have The
Copy rights of my name Degeneration X and
NWO ET-AL

Page 3 of 1

my employer and employees of WWE has
copies several Entertainment Photo News
articles of I DANA.W.WILEY CT-9123
AKA Ghetto.D

with Eric Wright AKA Eazy, E et-AL

That was taken by News Dept of Ohio
Newcastle PA-USA Today and Entertainment
weekly from Southern Park Mall Boardman
Ohio and Old Downtown Newcastle PA Mall
Threw out all 1994 and 1996 of 1998
from Yo-MTV Raps and BET Rap City
Ladies night show

Statement of Request

I DANA.W.WILEY CT-9123 AKA Ghetto.D

on 9 Day of March 2011

is requestion to my employer from WWE
who has multitude million Dollar
copy right and seventy five \$75 million Dollar
US Treasury WWE and TNA impact
stock market investment contract agreement
with me as of todote

will cash pay me fifty one \$51 million Dollar

Pursue section 703(H) Payment Law

with in next fifteen (15) days

follow by Lifetime cash Payments of
Three \$3 million Dollars a Year.

Page 4 of 1

Therefore my employer from WWE has the statute time fifteen (15) day to make that fiftyone \$51 million dollar payment with the release several Entertainment Photo News article of me with Eric Wright AKA Eazy E, et and The Government Documents involving Lawsuit Lisa Lopez AKA Lefteye filed on behalf my competence here and on The U.S. IRS Treasury Dept back in September 1996 involving them Treasury checks formal President Administrative Bill W. Clinton first class mail to me back in October 1994 for sum seventy five \$75 million Dollars a piece which is in your and other Government official Possession as of today if my employer from WWE fail to comply with in that statute time I will file my complaint here and to U.S. EEOC of Western PA William S. Moorhead and seek the compensation relief. I request from my employer in this complaint.

Page 5 of 1

I DANA.W.WILEY CT-9123 AKA ghetto.D
DECLARE BY US.CONST of LAW
Pursue to PenALTY of PerJury The said
facts are TRUE and CORRECT That my EMPLOYER
from world wrestling ENTertainment was GAVEN
fax or first CLASS MAIL Notificate
on 9 DAY and month March 2011
from address
111 S.MILTON ST New CASTLE PA 16101 and
175 Progress Drive WAYNESBURG PA 15370

Sincerely
Mr. Dana.W. Wiley

Date / / 2011

SENDER: COMPLETE THIS SECTION

1. Complete items 1, 2, and 3.
 2. Print your name and address on the reverse so that we can return the card to you.
 3. Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

Vince McMahon
 10 World Wrestling
 Entertainment
 241 East Main Street
 Stamford, CT 06902



9590 9402 1657 6053 7469 16

Article Number (Transfer from service label)

7015 0920 0001 9819 7458

S Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

J. Anderson

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below:

☐ No

3. Service Type

- ☐ Adult Signature
☐ Adult Signature Restricted Delivery
☐ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail
☐ Registered Mail
☐ Registered Mail Restricted Delivery (or \$500)
- ☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

EXhibit - B